

August 3, 2021

Document Electronically Filed

Hon. Debra Freeman
United States Magistrate Judge
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: Santana v. Commissioner of Social Security
Civil Action No: 1:20-cv-08893-DCF

Dear Judge Freeman:

This letter respectfully requests an extension of time of thirty (30) days for Plaintiff to serve her Motion for Judgment on the Pleadings in this matter. Plaintiff's Motion for Judgment on the Pleadings is currently due on August 9, 2021. However, due to the backlog of transcripts created by COVID-19 and the Commissioner's response, the Commissioner is able to produce records at a rapid pace. As a result, this has caused multiple, simultaneous filing deadlines that cannot be met. Plaintiff cannot meet the current briefing deadline. This extension is needed to thoroughly and properly prepare her Motion. Plaintiff's counsel has contacted defense counsel who consents to this request. This would be a first request to extend the time to serve Plaintiff's Motion.

If this request is granted, Plaintiff's Motion for Judgment on the Pleadings will be due on **September 8, 2021**. Subsequently, in accordance with the pattern of the Standing Order, the Commissioner's response to the Motion for Judgment on the Pleadings would then be due **November 8, 2021** (due to the deadline set out in Dkt. No. 5 resulting in a weekend filing deadline). Plaintiff's Reply would then be due **November 29, 2021**.

Thank you for your consideration.

Respectfully submitted,

/s/ Howard D. Olinsky

Howard D. Olinsky, Esq.


Bar Code H06529

Counsel for Plaintiff

CC [via ECF]: Benil Abraham and Joshua Lenard Kershner (Counsel for Defendant)

SO ORDERED.

Dated: 8/3/2021
New York, NY


Honorable Debra Freeman
U.S. Magistrate Judge

(This resolves Dkt. 20.)